STATE AIR POLLUTION CONTROL BOARD MEETING

LEXINGTON, VA, APRIL 10, 2007

SUMMARY OF BOARD ACTIONS

1. Request public comments on the five items listed on the following page titled "Proposed Board Actions Mirant PRGS".

2. Request public comments on the VDEQ Proposed Consent Order under Bullet #1.

3. Request public comments on the City's Proposed Order under Bullet #2.

Proposed Board Actions
Mirant PRGS

-- Request comments as to whether intermittent controls are allowed as part of a permit. If not, are they allowed during a phase-in period?

--Request comments as to whether the proposed Mirant stack-merge project is prohibited under federal or state law as a prohibited dispersion technique.

-- Publish for comment a state operating permit to be effective June 1, 2007(or as soon thereafter as possible) as allowed by law including, but not limited to, 9 VAC 5-80-800 C.2 and 9 VAC 5-80-820 D. Such permit shall limit SO2 emissions in lbs/hr and tons/year based on the AERMOD model with EBD approved by EPA so as to be protective of SO2 NAAQS. The lbs/hr shall be measured over a rolling 3-hour period.

-- Publish for comment a state operating permit to be effective June 1, 2007(or as soon thereafter as possible) as allowed by law including, but not limited to, 9 VAC 5-80-800 C.2 and 9 VAC 5-80-820 D. Such permit shall limit SO2 emissions as set forth in Attachment 1.

-- Publish for comment a state operating permit to be effective June 1, 2007(or as soon thereafter as possible) as allowed by law including, but not limited to, 9 VAC 5-80-800 C.2 and 9 VAC 5-80-820 D. Such permit shall limit SO2 emissions as set forth in Attachment 2.

Attachment 1.

MIRANT PRGS
PROPOSED SO2 LIMITS

Limits for Period June 1, 2007 – September 30, 2007

- 1,320 tons
- 0.50 lbs/MMBTU measured over rolling 3-hour period
- 338 lbs/hr for each unit[1] over a rolling 3-hour period
- If monitored SO2 equals 70% of NAAQS: limit of 700 lbs/hr for the plant over a rolling 3-hour period

Limits for Period October 1, 2007 – March 31, 2008

- 2,000 tons
- 0.40 lbs/MMBTU measured over rolling 3-hour period
- 270 lbs/hr for each unit[2] over a rolling 3-hour period
- If monitored SO2 equals 70% of NAAQS: limit of 700 lbs/hr for the plant over a rolling 3-hour period

Limits after March 31, 2008

- 3,500 tons/year
- 0.28 lbs/MMBTU measured over rolling 3-hour period
- 270 lbs/hr for each unit[3] over a rolling 3-hour period
- If monitored SO2 equals 70% of NAAQS: limit of 700 lbs/hr for the plant over a rolling 3-hour period

[1] Hourly limits based on 0.50 lbs/MMBTU and units operating at 70% capacity.
[2] Hourly limits based on 0.40 lbs/MMBTU and units operating at 70% capacity.
[3] Hourly limits based on 0.28 lbs/MMBTU and units operating at 100% capacity.

Attachment 2.

MIRANT PRGS
PROPOSED SO2 LIMITS

Limits for Period June 1, 2007 – March 31, 2008

- 3,300 tons
- 1000 lbs/hr for the plant over a rolling 3-hour period
- If monitored SO2 equals 70% of NAAQS: limit of 700 lb/hr for the plant over a rolling 3-hour period

Limits after March 31, 2008

- 3,500 tons/year
- 800 lbs/hr for the plant over a rolling 3-hour period
- If monitored SO2 equals 70% of NAAQS: limit of 700 lbs/hr for the plant over a rolling 3-hour period

@ 0.5 lbs/MMBTU	Lbs/Hr	MWH/Yr	TPY
Units 1 & 2 at 20% capacity	194	325,872	850
Units 3, 4 & 5 at 50% capacity	720	1,419,120	3,154
Overall average capacity = 39%	914	1,744,992	4,004
@ 0.4 lbs/MMBTU	**Lbs/Hr**	**MWH/year**	**TPY**
Units 1 & 2 at 27% capacity	210	439,927	918
Units 3, 4 & 5 at 61% capacity	703	1,731,326	3,078
Overall average capacity = 49%	913	2,171,253	3,996
@ 0.35 lbs/MMBTU	**Lbs/Hr**	**MWH/year**	**TPY**
Units 1 & 2 at 31% capacity	211	505,102	923
Units 3, 4 & 5 at 70% capacity	706	1,986,768	3,091
Overall average capacity = 56%	917	2,491,870	4,014
@ 0.28 lbs/MMBTU	**Lbs/Hr**	**MWH/year**	**TPY**
Units 1 & 2 at 35% capacity	190	570,276	834
Units 3, 4 & 5 at 75% capacity	605	2,128,680	2,651
Overall average capacity = 60%	795	2,698,956	3,485

Note: Units 1 & 2 capacity = 93 MW each; Units 3, 4 & 5 capacity = 108 MW each